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June 22, 2022

VIA ECF

The Honorable Jessica S. Allen, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Jorjani v. New Jersey Institute of Technology, et al.
Civil Action No. 2:18-cv-11693

Dear Judge Allen:

This firm represents Defendants in connection with the above-referenced matter. We write in furtherance of the Court's Opinion and Order (the "Order") dated June 2, 2022 [D.E. # 95] wherein the parties are directed to confer and file the documents addressed in the Order within twenty (20) days.

Accordingly, attached hereto are copies of the following documents: (1) D.E. # 62-1 in unredacted form in accordance with the Order; (2) D.E. # 62-2, as redacted pursuant to the Order; (3) D.E. # 62-3, as redacted pursuant to the Order; and (4) D.E. # 62-4, in unredacted form in accordance with the Order. Further, we noted in our preparation of the documents that the information contained at D.E. # 62-3, page 9, lines 8-10 reflected the same sensitive information contained in the prior lines of that response – even though these lines were inadvertently omitted from the original index requesting redactions. Upon recognizing this, we spoke with counsel for the Plaintiff who agreed that these lines should also be redacted. Thus, we have also applied redactions to those lines. Should Your Honor need any additional information or more formal applications with respect to these three lines (which, again, set out sensitive personnel disciplinary information regarding a non-party) we will happily provide it.

We thank the Court for its continued attention to this matter. If Your Honor or Your Honor's staff should have any questions or require anything further, we are always available.

Respectfully submitted,

s/ Marc D. Haefner
Marc D. Haefner

Hon. Jessica S. Allen, U.S.M.J.

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CC: Frederick C. Kelly, Esq. (via email)

Joseph J. Haspel, Esq. (via ECF)